



TUNG HAI™ Chlorella

February 14, 2005

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St., S.W.
Washington, DC 20204

MAR - 2 2005

RE: Dietary Supplement Statement of Support Notification

To: Whom It May Concern:

Nutritional Specialties, Inc., 1456 E. Katella Ave. Anaheim, CA 92805, the distributor of the following dietary supplement products, intends to make the following statement of support: "New Ester-E® formula is a body-ready vitamin E. Formed when natural d-alpha tocopherol is joined to a phosphate molecule during a patented process, supports antioxidant heart health and immune system."

This claim is being made for Vitamin E

Which is contained in LifeTime® Natural Ester-E® Softgels. This submission in being made in compliance with the requirements of 21 CFR 101.93.

The undersigned is an authorized representative of Nutritional Specialties, Inc. and certifies that the information contained in this notice is complete and accurate, and that Nutritional Specialties, Inc. has substantiation that the above statement is truthful and not misleading.

Thomas J. Kreech
Signature
Thomas J. Kreech
Full Name
Vice-President Operations
Title

975 0162

LET

16753

NUTRITIONAL SPECIALTIES, INC.

1456 E. Katella Avenue • Anaheim, CA 92805

1-800-333-6168 • 714-634-9340

Fax 714-634-9347

Email: lifetimevitamins@sbcglobal.net

91019